

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	No.: 09 CR 383-5, 9
	)	
ALFREDO VASQUEZ HERNANDEZ,	)	Chief Judge Ruben Castillo
a/k/a "Alfredo Compadre"	)	

**GOVERNMENT'S RESPONSE TO MOTION TO BAR EVIDENCE**

The UNITED STATES OF AMERICA, by its attorney, ZACHARY T. FARDON, United States Attorney for the Northern District of Illinois, respectfully submits this response to defendant Tomas Arevalo Renteria's Motion to Bar Evidence (R. 276). On March 26, 2014, Arevalo Renteria pleaded guilty to his role in the charged conspiracy, and thus his motion became moot as to him. However, the government understands defendant Vasquez Hernandez to have adopted co-defendant Arevalo's motion, and thus the government briefly addresses it.

In the motion, defendant Arevalo argued that certain allegations in the Third Superseding Indictment related to certain of defendants' co-conspirators would be unduly prejudicial as to defendants Vasquez Hernandez and Arevalo Renteria (now rendered moot). For purposes of the upcoming trial of Vasquez Hernandez, scheduled for May 12, the government does not feel litigation over those allegations is necessary. The government agrees that it will not introduce evidence, argue or make mention of the allegations contained in the last three paragraphs of the Third Superseding Indictment related to acts of violence. See R. 276 at 2-4. Additionally, the government will work with defense counsel to edit the indictment

(including the usual omission of references to the grand jury, etc.), to omit all references to the same for purposes of trial, and in the version of the indictment the jury is permitted to see.

Respectfully submitted,

ZACHARY T. FARDON  
United States Attorney

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Dated: April 1, 2014

**CERTIFICATE OF SERVICE**

The undersigned Assistant United States Attorney hereby certifies that the following document:

**GOVERNMENT'S RESPONSE TO MOTION TO BAR EVIDENCE**

was served pursuant to the district court's ECF system as to ECF filers on APRIL 1, 2014.

Respectfully submitted,

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